

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,  
et al.,**

**Plaintiffs and  
Counterclaim Defendants,**

**v.**

**PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and  
Counterclaim Plaintiffs.**

**Case No. 4:16-cv-02163**

**DECLARATION OF JARED GOODMAN**

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott (together, “Plaintiffs”). I make this declaration based upon my personal knowledge.

2. On December 25, 2018, Tonia Haddix created a Facebook group titled “Saving Connie’s Chimps From PETA.” A true and correct copy of the Facebook message reflecting the group’s creation is attached as **Exhibit A**.

3. On January 2, 2019, Haddix posted to the same Facebook group the business card of Victor Essen, Connie Casey’s counsel, to solicit money for legal fees for this matter, and stating that “with some encouragement and help [Casey] got back in the fight ... and has a very good chance of keeping all of her babies.” A true and correct copy of this Facebook post is attached as **Exhibit B**.

4. On January 14, Haddix wrote in a post to the same Facebook group, “please if you can donate do if not please share this to help Connie keep what rightfully belong to her and that’s her babies.” A true and correct copy of this Facebook post is attached as **Exhibit C**.

5. On October 17, after Casey filed the motion presently at issue, my colleague Martina Bernstein requested confirmation from Mr. Essen that Casey would provide approximately two additional hours for her court-ordered continued deposition in order to testify about the new matters alleged in her affidavit filed that day. Mr. Essen responded he could not agree to any more time than the two hours that had already been ordered by the Court. A true and correct copy of this correspondence is attached as **Exhibit D**.

6. On June 29, 2018, I sent a letter to Casey’s counsel rejecting Casey’s Offer of Judgment, explaining that the Offer was invalid on its face because “it is so vague as to render it impossible for Plaintiffs (and subsequently, the Court) to determine what the Offer entails,” including what chimpanzees were encompassed by it. A true and correct copy of this correspondence is attached as **Exhibit E**.

7. On or about July 2018, in subsequent discussions with Casey’s then-counsel, I specifically invited Casey’s counsel to resolve these ambiguities and provide a valid Offer for Plaintiffs’ consideration. Casey declined to do so.

8. On August 22, 2019, I emailed Casey’s counsel to propose that Plaintiffs, Casey, and Haddix participate in mediation in a continued attempt to resolve this matter by settlement. On September 5, Casey’s counsel responded that “mediation is [not] going to be feasible at this point in this case.” A true and correct copy of this correspondence is attached as **Exhibit F**.

I declare under the penalty of perjury that the foregoing is true and correct.

October 24, 2019

Los Angeles, CA

/s/ Jared Goodman  
Jared Goodman